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Attorneys for Defendants
UBER TECHNOLOGIES, INC.
and OTTOMOTTO LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

WAYMO LLC,

Plaintiff,

v.

UBER TECHNOLOGIES, INC.,
OTTOMOTTO LLC; OTTO TRUCKING LLC,

Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC. AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO
FILE UNDER SEAL THEIR
RESPONSE TO SPECIAL MASTER'S
RECOMMENDATION**

Pursuant to Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (“Defendants”) submit this motion for an order to file under seal their Response to Special Master’s Recommendation (“Response”). Defendants file under seal the below documents in accordance with Paragraph 14.4 of the Protective Order, but do not believe any of these documents contain sealable information:

Document	Portions to Be Filed Under Seal	Designating Party
Response to Special Master’s Recommendation (“Response”)	Highlighted Portions	Plaintiff (Green)
Chang Decl. Ex. A	Entirety	Collier Law Firm
Chang Decl. Ex. B	Entirety	Richard Jacobs
Chang Decl. Ex. C	Entirety	Plaintiff
Chang Decl. Ex. D	Entirety	Plaintiff

Defendants do not believe the green-highlighted portions of the Response or Exhibits C or D to the Declaration of Esther Chang (“Chang Declaration”) merit sealing, but Waymo designated this material “Highly Confidential – Attorneys’ Eyes Only.” Defendants file this material under seal in order to provide Waymo the opportunity to justify sealing pursuant to Local Rule 79-5. (Yang Decl. ¶ 3.)

Defendants file Exhibits A and B to the Chang Declaration under seal in order to provide Collier Law Firm and Richard Jacobs the opportunity to justify their respective “Confidential” designations for these documents. (Yang Decl. ¶ 4.)

Pursuant to Civil Local Rule 79-5(d)(2), Defendants will lodge with the Clerk the document at issue, with accompanying chamber copy.

Defendants served Waymo with this Administrative Motion to File Documents Under Seal on December 22, 2017.

1 Dated: December 22, 2017

MORRISON & FOERSTER LLP

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3 By: /s/ Arturo J. Gonzalez
ARTURO J. GONZALEZ

4 Attorneys for Defendants
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6 OTTOMOTTO LLC
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